

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XIAMIN ZENG,

Plaintiffs,

- against -

CITY OF NEW YORK, ET AL,

Defendants.

**DECLARATION OF ATAUR
RAQUIB IN SUPPORT OF
PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION
FOR SUMMARY
JUDGEMENT**

----- x 19-CV-3218 (JGK) (KHP)

ATAUR RAQUIB, an attorney duly admitted to practice in the State of New York and in this Court, declares, pursuant to 28 U.S.C. §1746, under penalty of perjury, that the following is true and correct:

I am an associate of Sim & DePaola, LLP, attorneys for Plaintiff, Xiamin Zeng. As such, I am familiar with the facts stated below. I submit this declaration in support of Defendants' Motion for Summary Judgement pursuant to Rule 56 of the Federal Rules of Civil Procedure.

1. Annexed hereto as Exhibit "1" is a true and correct copy of the entire transcript of the Deposition of Plaintiff conducted on September 8, 2022.

2. Annexed hereto as Exhibit "2" is a true and correct copy of the entire transcript of the Deposition of Defendant Detective Danielle Febus conducted on November 2, 2022.

Dated: Bayside, New York
May 4, 2023

Respectfully submitted,

SIM & DEPAOLA, LLP

By: /s/ Ataur Raquib, Esq.

Ataur Raquib, Esq.

SDNY Bar Number: 5860523

42-40 Bell Blvd., Suite 405

Bayside, New York 11361

Tel: (718) 281-0400

Fax: (718) 631-2700

Email: araquib@simdepaola.com

Attorneys for Plaintiff Peter Delgado